

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, et al.

Plaintiffs,

Civ. No. 04-00397-GBD

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**DECLARATION OF SHMUEL WALDMAN**

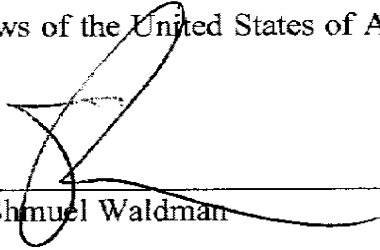
I, Shmuel Waldman, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am a plaintiff in the above-captioned case.
2. Though I was raised in Brooklyn, New York, when the complaint in this case was filed I was studying in Israel. Soon after the complaint was filed, in July 2004, I returned to the United States and I now reside in Lakewood, New Jersey with my wife and five children.
3. I intend to attend and testify at the trial in this case. Since I live in Lakewood, New Jersey (less than 40 miles from Brooklyn) transferring this case to the U.S. District Court for the Eastern District of New York in Brooklyn would be extremely convenient for me.
4. By contrast, attending trial in the District of Columbia would be extremely difficult if not impossible for me since: (i) I am receiving on-going medical care in New York for the injuries I suffered in the terrorist attack from which my case arises; (ii) my wife (who is also a plaintiff and also intends to attend and testify at the trial) and I have been blessed with five children under the age of eight; and (iii) my wife and I operate our own business and traveling out of the New Jersey/New York area to attend trial would cause serious harm to our business.

5. Transferring this case to D.C. would also be extremely inconvenient and expensive for me because I would have to bear the expenses involved in traveling to the D.C. area, as well as the huge costs and inconveniences of living in a hotel room and eating in a hotel or in restaurants during the course of the trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 27, 2011



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Shmuel Waldman